IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

THE STATE OF TEXAS, et al.,	
Plaintiffs,	
v.	Civil Action No. 4:20-cv-00957-SDJ
GOOGLE LLC,	
Defendant.	

EXHIBIT A

PLAINTIFF STATES' OPENING BRIEF TO THE SPECIAL MASTER FOR THE APRIL 4, 2024 HEARING

From: Geraldine W. Young

Sent: Tuesday, March 19, 2024 12:39 PM

To: MCCALLUM, Robert; Zeke DeRose III; MAHR, Eric (EJM); ELMER, Julie (JSE); Bryce Callahan; Paul

Yetter; John Harkrider; Daniel Bitton; Bracewell, Mollie; KAPLIN, Lauren

Cc: Marc B. Collier; Jonathan Wilkerson; John McBride; Peter M. Hillegas; Noah Heinz; Trevor Young

Subject: RE: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ

(E.D. Tex.)

Attachments: 2024.03.19 - Texas v. Google - Chats with Missing Metadata.xlsx

Rob,

Regarding the list of Google Chat bates numbers that you sent in your email below, we have identified Chats in that list that are still missing metadata that Google has produced for other Chats and that Google indicated at the March 7 Special Master hearing were extractable for Chats. The categories of missing metadata and the number of documents are outlined in the below chart, and the specific bates of the Chats with missing metadata are listed in the attached Excel. Please let us know if Google can provide these missing metadata (that, again, have been produced for other Chats). We are still analyzing on our end so may follow up with some additional Chats that are missing these metadata fields.

Missing Metadata Field	Number of Documents/Chats Missing Metadata
Rev Recipient	180 (excluding attachments)
Rev From	172 (excluding attachments)
Master Date	1,676

Thanks, Geraldine

From: MCCALLUM, Robert < rob.mccallum@freshfields.com>

Sent: Friday, March 1, 2024 3:41 PM

<pyetter@yettercoleman.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>;

Bracewell, Mollie <mbracewell@yettercoleman.com>; KAPLIN, Lauren <lauren.kaplin@freshfields.com>

Cc: Marc B. Collier <marc.collier@nortonrosefulbright.com>; Jonathan Wilkerson

<Jonathan.Wilkerson@LanierLawFirm.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; John
McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Noah
Heinz <Noah.Heinz@kellerpostman.com>; Trevor Young <Trevor.Young@oag.texas.gov>

Subject: RE: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)

[External Email – Use Caution]

Counsel -

Please see attached.

Kind regards, Rob

From: Zeke DeRose III < Zeke.DeRose@LanierLawFirm.com >

Sent: Monday, February 26, 2024 2:12 PM

To: MAHR, Eric (EJM) < ELMER, Julie (JSE) < Julie.Elmer@freshfields.com; Bryce Callahan < ELMER, Julie (JSE) < Julie.Elmer@freshfields.com; Bryce Callahan ELMER, Julie (JSE) < a href="mailto:Julie.Elmer@freshfields.com">Julie.Elmer@freshfields.com; John Harkrider < julie.Elmer@freshfields.com); John Harkrider < julie.Elmer@freshfields.com); John Harkrider < julie.Elmer@freshfields.com); Julie.Elmer@freshfields.com); Julie.Elmer@freshfi

Daniel Bitton <<u>dbitton@axinn.com</u>>; MCCALLUM, Robert <<u>rob.mccallum@freshfields.com</u>>; Bracewell, Mollie

<mbracewell@yettercoleman.com>; KAPLIN, Lauren <lauren.kaplin@freshfields.com>

Cc: Marc B. Collier <marc.collier@nortonrosefulbright.com>; Jonathan Wilkerson

<<u>Jonathan.Wilkerson@LanierLawFirm.com</u>>; Geraldine W. Young <<u>geraldine.young@nortonrosefulbright.com</u>>; John McBride <<u>john.mcbride@nortonrosefulbright.com</u>>; Peter M. Hillegas <<u>peter.hillegas@nortonrosefulbright.com</u>>; Noah Heinz <<u>Noah.Heinz@kellerpostman.com</u>>; Trevor Young <<u>Trevor.Young@oag.texas.gov</u>>

Subject: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)

Counsel,

I have attached a letter regarding our Meet and Confer on Friday related to the States' requests for chats, unredacted transcripts and exhibits from the DOJ Search trial, and requests for production related to state-law DTPA claims.

We look forward to continued conversation.

Zeke



Zeke DeRose III
Attorney
p: 713-659-5200
10940 West Sam Houston Pkwy N, Suite 100
Houston • Texas • 77064
www.LanierLawFirm.com

This e-mail is confidential and may be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it, use it for any purpose or disclose its contents to any other person; to do so could be a breach of confidentiality. Thank you for your cooperation. Please contact our IT Helpdesk at GloballTServiceDesk@freshfields.com if you need assistance.

Freshfields Bruckhaus Deringer US LLP has offices in New York, Silicon Valley and Washington, DC. Freshfields Bruckhaus Deringer LLP is a limited liability partnership registered in England and Wales with registered number OC334789, and has offices or associated entities in Austria, Bahrain, Belgium, China, England, France, Germany, Hong Kong, Italy, Japan, the Netherlands, Singapore, Spain, the United Arab Emirates and Vietnam.

Any reference to a partner means a member, or a consultant or employee with equivalent standing and qualifications, of Freshfields Bruckhaus Deringer US LLP, Freshfields Bruckhaus Deringer LLP or any associated firms or entities.

For information about how Freshfields Bruckhaus Deringer processes personal data please refer to this <u>Privacy notice</u>. For further information about Freshfields Bruckhaus Deringer, please refer to our website at <u>www.freshfields.com</u>.